

# OUTDOOR ALLIANCE

June 20, 2025

U.S. Department of the Interior  
Office of the Solicitor  
1849 C Street NW  
Washington, DC 20240.

*Submitted via email to [Interior.RegulatoryInfo@doi.gov](mailto:Interior.RegulatoryInfo@doi.gov)*

## **RE: Department of Interior Request for Information on Regulatory Reform.**

Dear Secretary Burgum and Acting Solicitor Zerzan,

On behalf of the human-powered outdoor recreation community, we write to comment on the Department of Interior's (DOI) existing regulations in response to Federal Register Doc. 2025-08931. DOI lands include some of the nation's—and the world's—most iconic and valued outdoor recreation opportunities, which in turn support strong economic benefits related to outdoor recreation and tourism at both the local and national level. Ensuring responsible long-term stewardship of these lands is a top priority for our community. As DOI undergoes a review of its regulations, the agency must take a long-term comprehensive view that accounts for the full range of benefits, including outdoor recreation, that DOI lands and the regulations that govern them provide to the American public.

Outdoor Alliance is a coalition of ten member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

DOI lands managed by the Bureau of Land Management (BLM), the National Park Service, and the U.S. Fish and Wildlife Service contain an astonishing variety of recreation opportunities ranging from easily accessible scenic viewpoints, to front country trail systems, to remote mountaineering objectives in National Parks, to



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wildlife-dependent recreation, and beyond. These opportunities attract visitors from nearby communities and from across the globe. Visitors to DOI public lands benefit from challenging themselves on a variety of terrain, and from experiencing natural landscapes in a way that helps build a societal understanding and appreciation for our country's natural history. The range of infrastructure and terrain on DOI lands—with essential support from a well qualified agency workforce—allows visitors of all backgrounds to experience the benefits of America's public lands.

The Request For Information (RFI) states that submitters are “encouraged to provide economic data to demonstrate the cost of complying with existing regulations, as well as the savings that a change might provide.” In evaluating existing regulations, it is essential that the agency consider benefits as well as costs, and we encourage DOI to consider the critical economic role that DOI lands and regulations that help to balance multiple use play in supporting America's outdoor recreation economy. According to the Bureau of Economic Analysis, outdoor recreation supported nearly \$1.2 trillion in gross economic output, 2.3 percent of GDP, and nearly 5 million American jobs in 2023.<sup>1</sup> At the agency level, recreation activities on BLM lands contributed \$11.1 billion to the economy and 73,000 jobs in 2022,<sup>2</sup> while National Parks contributed \$55.6 billion to the U.S. economy and supported 415,000 jobs in 2023.<sup>3</sup> Beyond those numbers, outdoor recreation amenities and access to public lands and waters play a huge role in attracting a wide array of businesses and workers to rural communities across a range of industries and support vibrant and diversified local economies.

Because the economic and public health benefits of outdoor recreation are contingent on sustainable access to well-managed public lands, our community is deeply invested in the long term environmental health of these lands. In this context, we are highly affected by agency regulations and decisions, including energy siting, and we depend on public processes to help agencies tailor decisions

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<sup>1</sup> U.S. Bureau of Economic Analysis, BEA 24-53, Outdoor Recreation Satellite Account, U.S. and States, 2023 (2024).

<sup>2</sup> U.S. Dept. of Interior, Bureau of Land Management, The BLM: A Sound Investment for America 2022 (2023).

<sup>3</sup> U.S. Dept. of Interior, National Park Service, Science Report NPS/SR—2024/174, 2023 National Park Visitor Spending Effects Economic Contributions to Local Communities, States, and the Nation, *available at* <https://doi.org/10.36967/2305351>.



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in a way that effectively balances multiple uses and minimizes unnecessary negative impacts to outdoor recreation. As DOI works to align its regulations with recent executive orders, we ask that the agency maintain its commitment to basing decisions on sound science, robust public input, and statutory direction aimed at the harmonious integration of multiple-use activities on landscapes.

We recognize that DOI is conducting this review in response to several Executive Orders that require evaluation of the costs and savings associated with regulations. This is a useful, but incomplete frame for understanding a regulation's value to society. DOI's review should also clearly examine the benefits of regulations to the public, any indirect economic benefits, and effects on vital ecosystem services like clean water. Any review through a financial lens must also comprehensively assess the costs of rescinding or replacing a regulation, including on recreation and conservation values.

As advocates for recreation infrastructure, such as trail systems, the outdoor recreation community frequently works with DOI as a project proponent, and we are familiar with frustrations around project delays and other aspects of working within the administrative process. In our experience, delays often occur due to a lack of agency capacity and issues around agency culture rather than because of regulatory burden. For years, Outdoor Alliance and our partners in the recreation community have worked with Congress in a bipartisan manner to secure responsible investments in DOI agencies' land stewardship capacity, and we have seen success through the appropriations process, as well as through landmark laws like the Great American Outdoors Act. In this context, we are alarmed by the Agency's current work to reduce the workforce responsible for stewarding public lands and waters despite contrary direction from Congress. In addition to reviewing its regulations, we ask that DOI pause and reconsider its plans for reorganizations and reductions in force so that permitting, land management, and other core responsibilities of the Agency can function efficiently as Congress intended.

The outdoor recreation community and the outdoor economy also benefit from—and seek—an environment of regulatory stability and certainty within the federal land management agencies. To this end, we are concerned that any effort by DOI to rescind regulations without fully considering their benefits would erode our ability to work with DOI towards sound land management outcomes.



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For example, recreationists regularly work with the BLM to revise and update Resource Management Plans to better integrate outdoor recreation into BLM land management. BLM planning is currently governed by a decades-old planning rule (43 CFR Part 1610) that stymies the agency's ability to properly account for modern forms of recreation and modern recreational use patterns. While the agency worked to revise its regulations in 2016, Congress rescinded this rule via the Congressional Review Act in 2017. More recently, BLM adopted the Public Lands Rule (43 CFR Part 6100), which clarifies how the agency manages lands for multiple use in a way that informs resource management planning. Our community strongly supports the Public Lands Rule, which provides certainty that recreational uses of public lands will be considered fairly alongside other multiple uses including energy development, conservation, and grazing. We are disappointed to see that the Administration is proposing to rescind the Rule, which will once again leave BLM without a modern policy framework for balancing multiple-use activities in a sustainable way on the landscape.<sup>4</sup>

BLM's 2024 Fluid Mineral Leasing Rule is another example of a critically important regulation for balancing multiple-use activities on BLM land. Our community is deeply invested in helping to ensure that energy development activities occur without undue burden on outdoor recreation and the outdoor recreation economy. The leasing preference criteria at 43 CFR § 3120.32 help direct agency discretion in a fashion that helps to reduce conflict and undue impacts on outdoor recreation, a primary use of public land as defined under the Federal Land Policy and Management Act.

Finally, any effort by DOI to rescind regulations should be made transparently and through existing legal processes under the Administrative Procedure Act. We are concerned that, because of the clear focus on energy development and timelines articulated in the Executive Orders cited in this RFI, decisions to rescind regulations may be made hastily and without full consideration of other public values, including outdoor recreation. As a major user of public lands, and as an important part of America's economy, our community deserves an opportunity to weigh in on decisions that will affect public lands for decades to come. Rescinding regulations without a clear public process would be short sighted and would run counter to

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<sup>4</sup> See <https://www.reginfo.gov/public/do/eoDetails?rrid=907019>.



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RFI's stated goal of ensuring "the responsible stewardship of the Nation's public lands and resources."

Thank you for considering our community's input. We look forward to working with you to steward our nation's priceless public lands.

Best regards,



Louis Geltman  
Vice President for Policy and Government Relations  
Outdoor Alliance

cc: Adam Cramer, Chief Executive Officer, Outdoor Alliance  
Heather Thorne, Executive Director, Access Fund  
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